

EXHIBIT 6

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LLC; BEST BUY ENTERPRISE SERVICES, INC.;
BEST BUY STORES, L.P.; BESTBUY.COM, L.L.C.;
and MAGNOLIA HI-FI, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master Case No.: 3:07-cv-05944-SC
MDL No. 1917
Individual Case Nos.
3:11-cv-05513-SC;
3:13-cv-05264-SC

This document relates to:

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513-SC*

*Best Buy Co., Inc., et al. v. Technicolor SA, et
al., No. 13-cv-05264-SC*

**SUPPLEMENTAL DECLARATION OF
DAVID MARTINEZ IN SUPPORT OF
MOTION FOR PROTECTIVE ORDER**

Judge: Special Master Vaughn Walker

1 I, DAVID MARTINEZ, declare as follows:

2 1. I am a partner with the law firm of Robins, Kaplan, Miller & Ciresi L.L.P., counsel
3 for Plaintiffs Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc.,
4 Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi, Inc. (collectively "Best Buy")
5 in the above-captioned action currently pending in the U.S. District Court for the Northern
6 District of California. I submit this supplemental declaration in support of Best Buy's Letter
7 Brief in Support of Motion for Protective Order. I have personal knowledge of the facts stated
8 herein, and I could and would competently testify thereto if called as a witness.

9 2. Attached hereto as **Exhibit F** is a true and correct copy Panasonic Corporation of
10 North America, MT Picture Display Co., Ltd., and Panasonic Corporation's FRCP Rule 30(b)(6)
11 Notice of Deposition of Best Buy, dated November 20, 2012.

12 I declare under penalty of perjury under the laws of the United States of America and the
13 State of California that the foregoing is true and correct to the best of my knowledge.

14 Executed this 12th day of June, 2014 in Los Angeles, California.

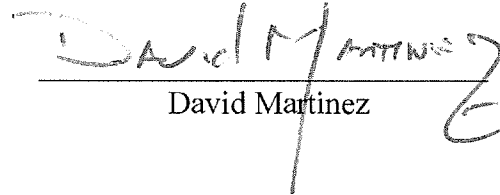
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16 David Martinez
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EXHIBIT F

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*Attorneys for Defendants Panasonic Corporation of North America, MT Picture Display Co., Ltd.,
and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd)*

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

) Master File No. 3:07-cv-05944 SC
)
) MDL NO. 1917
)
) **NOTICE OF DEPOSITION OF**
) **BEST BUY**
)

This Document Relates To:
ALL ACTIONS

) Judge: Hon. Samuel Conti
)
) Special Master: Hon. Charles Legge
) (Ret.)
)
)

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD IN THIS ACTION:

YOU ARE HEREBY NOTIFIED that, pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendants Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd), by and through their counsel and in conjunction with all defendants, will take the deposition of a designated representative of Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, LLC, and Magnolia HI-FI, Inc. (collectively, "Best Buy"), commencing on December 3, 2012 at 9:30 AM at the offices of Robins, Kaplan, Miller & Ciresi L.L.P., 800 LaSalle Avenue, Minneapolis, MN 55402. The topics of the deposition are listed in Exhibit A.

YOU ARE FURTHER NOTIFIED that the deposition shall be recorded stenographically by a certified shorthand reporter who is duly authorized to take and transcribe said deposition, and a real-time transcription service such as LiveNote may also be available for the use of counsel. The deposition may also be recorded by videotape, and the defendants reserve the right to use the videotape of the deposition at trial.

Dated: November 20, 2012

WINSTON & STRAWN LLP

By: /s/ Molly M. Donovan

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EXHIBIT A
DEFINITIONS

1. “Any” shall be construed to mean “any and all.”
2. “CRT” or “CRTs” means any (a) color picture tubes (“CPTs”), which are cathode ray tubes used primarily in color televisions; and (b) color display tubes (“CDTs”), which are used primarily in color computer monitors.
3. “CRT Finished Product” means televisions containing CPTs and/or computer monitors containing CDTs.
4. “CRT Product” means any CRT or CRT Finished Product.
5. “Defendant” or “Defendants” means any of the entities currently or formerly named as defendants in this litigation and, without limitation, all of their past and present parents, subsidiaries, affiliates, joint ventures, officers, directors, employees, agents, attorneys, or representatives (and the parents’, subsidiaries’, affiliates’, or joint ventures’ past and present officers, directors, employees, agents, attorneys, or representatives), and the predecessors, successors, heirs, executors, administrators, and assigns of each of the foregoing.
6. “Document” or “documents” has the broadest possible meaning pursuant to the Federal Rules of Civil Procedure including, but not limited to, all writings and other tangible things upon which any form of communication is recorded or reproduced, and preliminary drafts and non-identical copies of the above (whether such copies differ from the original by reason of notation made on such copies or otherwise). Without limiting the generality of the foregoing, the term “document” or “documents” includes, but is not limited to, correspondence, memoranda, notes, records, letters, envelopes, telegrams, messages, studies, analyses, contracts, agreements, working papers, accounts, analytical records, reports and/or summaries of investigations, trade letters, press releases, comparisons, books, calendars, diaries, articles, magazines, newspapers, booklets, brochures, pamphlets, circulars, bulletins, notices, drawings, diagrams, instructions, notes or minutes of meetings or of other communications of any type, including inter- and intra-office communications, questionnaires, surveys, charts, graphs, photographs, phonograph recordings, films, tapes, disks, data cells, print-outs of information stored or maintained by electronic data processing

1 or word processing equipment, including email, and all other data compilations from which
2 information can be obtained (by translation, if necessary, by you through detection devices into
3 usable form), including, but not limited to, electromagnetically sensitive storage media such as
4 floppy disks, hard disks and magnetic tapes, and any preliminary versions, drafts or revisions of any
5 of the foregoing. "Document" or "documents" also includes each and every file folder or other
6 material in which the above items are stored, filed or maintained.

7 7. "Or" and "and" should be construed so as to require the broadest possible response.
8 If, for example, a request calls for information about "A or B" or "A and B," you should produce all
9 information about A and all the information about B, as well as all information about A and B
10 collectively. In other words, "or" and "and" should be read as "and/or."

11 8. "Relating to," "referring to," "regarding" or "with respect to" mean, without
12 limitation, the following concepts: discussing, describing, reflecting, dealing with, and pertaining to,
13 analyzing, evaluating, estimating, constituting, studying, surveying, projecting, assessing, recording,
14 summarizing, criticizing, reporting, commenting, or otherwise involving, in whole or in part.

15 9. "Relevant Period" means March 1, 1995 to November 25, 2007.

16 10. "You," "Your," or "Your Company" mean the responding plaintiffs Best Buy Co.,
17 Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P.,
18 BestBuy.Com, L.L.C., and Magnolia Hi-Fi, Inc., together with all present and former directors,
19 officers, employees, or agents of the entities listed in this Definition.

SCHEDULE OF TOPICS

Witnesses with knowledge of the following matters during the Relevant Period (unless a time period is specified otherwise):

1. Your policies and practices for setting the price at which You sold CRT Finished Products to Your customers, including consideration or use of the following: (a) formulas; (b) factors such as cost, supply, demand, competitor pricing, market forecasts, and product specifications; (c) price guidelines or price lists; (d) negotiations or negotiated prices; and (e) alternative distribution channels.

2. Your knowledge and understanding of any relationship between the prices at which You purchase CRT Finished Products and the prices at which You sell CRT Finished Products, including, but not limited to, the effects that changes in the prices that You pay to purchase CRT Finished Products have on costs, revenues and profits from Your sales of CRT Finished Products.

3. Your use of discounts, promotions, rebates or loyalty programs in connection with the sale of CRT Finished Products to Your customers, including how You recorded such discounts or rebates, and the identity and location of Documents or data recording such discounts or rebates.

4. Your standards and practices with regard to tracking the purchases and sales of CRT Finished Products for determining the profitability of sales, and for financial reporting purposes, including the nature of the financial data available, the location of such data, and the names of individuals responsible for maintaining such data.

5. A complete explanation of Your transactional sales and purchase data for CRT Finished Products, including any transactional-level sales data produced by You in this action and the information contained in such data.

CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2012, I electronically caused a copy of “Notice of Deposition of Best Buy” to be served via e-mail upon Laura Nelson of Robins, Kaplan, Miller & Ciresi L.L.P., counsel for Best Buy, at lenelson@rkmc.com, as well as counsel for parties who have entered an appearance in this case.

By: /s/ Jennifer Stewart
Jennifer Stewart